

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

COSMOKEY SOLUTIONS GMBH)	
& CO. KG,)	
)	
Plaintiff,)	C.A. No. 18-1477-CFC
)	
v.)	JURY TRIAL DEMANDED
)	
DUO SECURITY, INC.,)	
)	
Defendant.)	

**STIPULATION AND [PROPOSED] ORDER TO ALLOW PLAINTIFF TO
AMEND COMPLAINT**

Pursuant to Fed. R. Civ. P. 15(a) and the Court’s Scheduling Order (D.I. 45), Plaintiff CosmoKey Solutions GmbH & Co. KG (“CosmoKey”) and Defendant Duo Security, Inc. (“Duo”) hereby jointly submit this Stipulation and [Proposed] Order to Allow CosmoKey To Amend Complaint, and state as follows:

WHEREAS, the deadline to amend pleadings is March 31, 2023 (D.I. 45);

WHEREAS, CosmoKey informed Duo that it intends to amend its First Amended Complaint (D.I. 15) to add as a defendant Cisco Systems, Inc. (“Cisco”), which is the parent company of defendant Duo Security, Inc. (“Duo”), and to add indirect infringement claims against Duo;

WHEREAS, through this stipulation, Duo consents to allow CosmoKey to amend its First Amended Complaint but reserves all rights;

WHEREAS, pursuant to D. Del. L.R. 15.1, CosmoKey's Second Amended Complaint is attached as Exhibit 1, and a redline showing the changes from the First Amended Complaint is attached as Exhibit 2;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that:

1. CosmoKey may amend its First Amended Complaint in accordance with Fed. R. Civ. P. 15(a) with the Second Amended Complaint attached as Exhibit 1. The Second Amended Complaint shall be deemed filed and served as of the date this Stipulated Order is signed by the Court; and

2. Cisco and Duo's deadline to file a motion to dismiss, answer, or otherwise respond to the Second Amended Complaint is April 21, 2023.

POTTER ANDERSON & CORROON LLP

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

By: /s/ Bindu A. Palapura
David E. Moore (#3983)
Bindu A. Palapura (#5370)
Andrew L. Brown (#6766)
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com
abrown@potteranderson.com

By: /s/ Jennifer Ying
Jack B. Blumenfeld (#1014)
Jennifer Ying (#5550)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
Tel: (302) 658-9200
jblumenfeld@morrisnichols.com
jying@morrisnichols.com

Attorneys for Defendant Duo Security, Inc.

*Attorneys for Plaintiff CosmoKey
Solutions GmbH & Co. KG*

Dated: March 31, 2023
10716662/19335.00001

IT IS SO ORDERED this ____ day of ____, 2023.

Chief United States District Judge